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**Subject:** draft exposure picture  
**Date:** Thursday, September 13, 2012 12:12:42 PM  
**Attachments:** [Draft exposure and source picture for tissue.pptx](#)

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Hi All,

I have been grappling with trying to define the geographic boundaries of our CWA WQS and how that intersects with our CWA WQS regulation of sources of contamination and sources of fish/shellfish. I have tried to put these concepts together in a graphic – which I know will need revision. You might or might not agree with the way I have delineated between CWA and non-CWA areas and sources, and I would appreciate your comments. I would like to get the most accurate picture I can on how all these work together, and be able to illustrate it for people. In the attached draft picture the largest shape includes all exposures to a hypothetical chemical, and it is divided down further into CWA-covered sources of exposure to the chemical. Since this is such an early draft I would appreciate if you don't forward it on to others – would like your input at first as I try to get it correct and clear.

Why am I doing this? I need to be able to deal with the question of why we would include anadromous fish consumption (or a percentage of anadromous fish consumption) in a CWA criterion. Oregon did this and many here also want it. I think including salmon is a huge state risk management decision because, as I read the 2000 guidance (and earlier guidance), EPA has already made the risk management decision that anadromous fish and the chems in sources not regulated by the CWA (and that includes the contaminants in salmon that are picked up in the ocean beyond the CWA's control) would not be included in these criteria that implement the CWA. This was shown by the decision not to include salmon in the FCR (under the assumption that the contaminants in salmon were picked up in the open ocean outside the regulation and control of the CWA) and by using RSCs to account for other sources of exposure. I find the EPA decision in this case to be consistent with my understanding of the coverage of the CWA. I need to be able to discuss this clearly with the public, so that whatever the final outcome is regarding use of salmon in the FCR for Washington, the risk management decision will be made with all available information and with eyes wide open.

If you have time please give this a look, and I would really appreciate your comments. If I have not made it understandable please ask for clarification – that will help me fix it.

Maybe, if we have some different views or information on this, we could get a conference call together to talk about and clarify the issues around this. And – I am putting together a list of other issues we can all talk about together (Don is helping with this), so maybe we could just use this as the start.

Thanks for your help,

Cheryl

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